

**IN THE UNITED STATES BANKRUPTCY COURT FOR
THE EASTERN DISTRICT OF TENNESSEE
AT GREENEVILLE**

IN RE:)	
)	
RONALD D. COLLINS,)	Case No. 2:18-BK-50532-MPP
)	Chapter 13
)	
Debtor.)	

OBJECTION TO CONFIRMATION

CREDITOR: INTERNAL REVENUE SERVICE

The above Creditor objects to confirmation of this amended plan, and for grounds says:

- (X) 1. Creditor has a secured claim and has not accepted the plan.
- () 2. Creditor does not have adequate protection.
- () 3. Creditor's security has been improperly valued.
- (X) 4. Creditor is entitled to full payment of its secured claim with interest at the rate of 4% percent. To pay the secured claim with interest over a five-year period will require sixty (60) monthly payments of \$2,522.81. Creditor objects to not receiving any monthly payments as stated in Section 8.1.
- () 5. The plan does not provide for full payment of the Creditor's priority claim in accordance with 11 U.S.C. § 1322(a)(2).
- () 6. Debtor has the potential to accrue post-petition tax liability.
- () 7. The plan is not in good faith and/or is not feasible.
- (X) 8. The plan does not provide for meaningful payment.
- () 9. Creditor objects under 11 U.S.C. § 1307(e) and 11 U.S.C. § 1308(a) because Debtor has not filed his returns.

WHEREFORE, Creditor prays for a hearing, such orders as may be appropriate, and for notice and opportunity to be heard on any other matters, proceedings, or order in this cause.

Respectfully submitted,

J. DOUGLAS OVERBEY
United States Attorney

/s/ Kenny L. Saffles

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CERTIFICATE OF SERVICE

I hereby certify that a true copy of the foregoing Objection has been served via the court's electronic noticing system and/or postage paid by the United States Postal Service to the following people this 21st day of August, 2018.

Ronald D. Collins
1062 Morning Star Road
Church Hill, TN 37642

D. Stephen Duncan
Debtor's Counsel
By CM/ECF

Gwendolyn M. Kerney
Chapter 13 Trustee
By CM/ECF

United States Trustee
By CM/ECF

/s/Kenny L. Saffles

Kenny L. Saffles
Assistant United States Attorney